



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

September 24, 2020

VIA ECF

The Honorable P. Kevin Castel
United States District Court
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. Grasso, et al.*, 20 Cr. 163 (PKC)

Dear Judge Castel:

The Government writes to provide the Court with a brief update regarding proceedings in this matter, and to respectfully request an adjournment of the upcoming status conference, currently scheduled for Friday, October 2 at 11 AM.


As the Court is aware, on March 9, 2020, the Government unsealed the Indictment in the above-captioned case, in addition to three others arising from the same investigation. The defendants in this matter were arrested and presented that same day. On April 21, 2020, the defendants first appeared before this Court telephonically for an arraignment and initial conference. During that status conference, the Court set a further status conference date of October 2, 2020 at 11 AM. Since the parties last appeared before the Court, the Government has made rolling productions of group and individual discovery. The Government is currently preparing its final production of Rule 16 discovery to the defendants, which it anticipates producing by the Court-ordered discovery deadline.

[Continued]

In light of the foregoing, and after consultation with the Court and defense counsel, the Government respectfully requests that the Court adjourn the upcoming status conference and instead calendar a teleconference for October 28, 2020 at 10:30 AM. For the same reasons, the Government also requests that time be excluded under the Speedy Trial Act between October 2 and the date of the next status conference to provide the parties an opportunity to review and discuss discovery, pre-trial motions, and other matters in advance of the next conference. The Government has alerted all defense counsel to the instant requests and the proposed date, and requested any objections by September 23, 2020; the Government has received no objections.

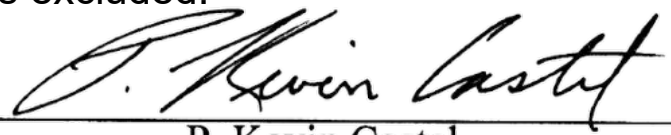
Very truly yours,

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Cc: All counsel of record (by ECF)

Upon the application of the government, consented to by defense counsel, the conference originally scheduled for October 2, 2020 is adjourned to October 28, 2020 at 10:30 a.m. in Courtroom 11D. I find that the ends of justice will be served by granting a continuance and that taking such action outweighs the best interest of the public and the defendant in a speedy trial. The reasons for this finding are that the grant of the continuance is necessary to provide the parties an opportunity to review and discuss discovery and pre-trial motions, and other matters in advance of the next conference. Accordingly, the time between today and October 28, 2020 is excluded.
SO ORDERED.


P. Kevin Castel
United States District Judge

9/25/2020